WIN/INFORMED

UID/WAM PAA: ICR RELIANT CHANGES

PROGRAM SYSTEM ANALYSIS

RCRAINFO SYSTEM CHANGES

February 28, 2001

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INTRODUCTION

This document provides details of the types of changes that will made to the national RCRAInfo system to support the implementation of the ICR reliant recommendations from the Universe Identification / Waste Activity Monitoring Program Area Analysis (PAA) project.

The project team considered each recommendation from the PAA report that required an ICR to modify the data collection forms, and developed a new Site Identification form to replace the existing form using for the biennial Hazardous Waste Report. This same form will also be used to replace the existing Notification and Permit Part A Application forms.

Having developed the new form, the team considered the impacts to RCRAInfo based on the new form and the recommendations that affected the form. The team identified the types of changes that would be required to the database, the data entry screens, the on-line reports and the translator flat files. The changes were generally either related to adding/modifying data fields or removing data fields that the PAA did not identify as National or Shared needs for Implementers and EPA.

This document contains a summary of the changes organized by PAA recommendation and general types of changes. A separate document contains the appendices, which identify and organize the types of changes required to the RCRAInfo database, data entry forms, reports and translator guides. These are technical documents and have an intended audience of RCRAInfo developers and technical users. These appendices are not intended to be precise specifications for system changes, but rather input documents to the RCRAInfo design team that will determine how the changes should best be implemented within the system.

Please note that the PAA Report should be used for reference when considering this document.

REVISED SITE IDENTIFICATION FORM

Recommendation Summary

The following PAA Recommendations are considered in this section:

7 - Merge common elements of current site identification forms,

8 - Add additional Data Elements to Notification Form, and

9 - Provide standard notification of handlers of universal wastes

A new *Site Identification* form has been developed to harmonize the site profile information that is currently collected on the Notification form, the Part A Permit Application, and Hazardous Waste Report Identification and Certification form along with other non-standardized forms (e.g. Notice of Emergency Site, Transporter Application).

Basic Site Identification Information

Design Decisions

NAICS code values will be populated using a cross-reference from current SIC code information based on Biennial Report waste stream data. The current SIC codes will be readily accessible through lookup tables. A 'cross-reference' lookup table will include NAICS codes with their corresponding SIC codes.

It was determined that for all TSDFs the SIC codes will be converted directly to NAICS code(s). For non-TSDFs, Implementer's will be given the choice as to which option to choose for conversion. The Implementers can choose to convert all existing SIC codes or only those SIC codes that directly map to one NAICS. (Note: this question can be included as part of the *RCRAInfo Data Integration* project National Review).

The Mailing Country field is also new to the Site Identification form. The conversion / data entry of this field will be up to each state and will be blank to start with.

The 'Date Change Operator/Owner' field will now read 'Date Became Operator/Owner'. This change of the field name will also be accompanied by a specific change in the definition of the field. It will strictly be the date that the Operator or Owner became the Operator or Owner.

The data collected within the certification block on the Site Identification was determined to be a shared need, and should therefore be optional in the system. It was determined to keep the BRS fields and give the state the option to track the certification information. The information included consists of the Last Name, First Name, Title, and Date signed on the form. Given that the new form allows for multiple certifications per form, the system will also track multiple entries.

Site Activity Information

Design Decisions

In general, activity fields in RCRAInfo are populated with either an "X" or blank to indicate if the submitter (e.g., the RCRA Site or an inspector) ticked the box on the form or not. Given that the current structure of the database contains records for these fields for all historical data, the team has concluded that this could be better tracked as three values (meaning: 'yes', 'no', and 'unknown'). When a new activity field is added to the database it will be defaulted to 'unknown' for all current records. This will allow historical data to better reflect that, for example, the Importer Activity was unknown for all prior collections of site activity data, and not risk users misinterpreting a blank entry as a 'No' – which was not what was reported at that time. The PSD team will determine how 'Unknown' will be designed for the system.

During the review of the activity fields, the initiative was taken to try to make the format of those fields more consistent. Specifically, some fields that allowed two independent indicators to be tracked (by providing values for one, the other or both) were converted into two separate fields. For example, Used Oil Transporter and Used Oil Transfer Station are now two separate fields, whereas they used to be one. The PSD team should ensure that the format of all of the yes/no type of fields are consistently formatted so that a user of the data can rely on the values for one field will be consistent with those of another such field.

The new Mixed Radioactive Waste Generator activity flag will be pre-populated based on whether there were any WR forms during the 1999 cycle that showed that mixed radioactive waste was sent to a TSDF from that generator. (Based on the RAD_MIX flag in the BR1 Basic Form WR Info table – by converting all 'Y's and '1's into 'Y').

An Importer Activity flag will be added but will be populated with 'unknown'.

A Destination Facility for UW flag will be added but will be populated with 'unknown'.

A new table will be added to capture details of the universal waste handling activities. This data is captured on the Site Identification form in the fields named Large Quantity Handler of Universal Waste. The new table will include three fields; UW Type, Generated Indicator, Accumulated Indicator.

The following table cross-references the final set of form fields to the existing RCRAInfo fields (note, other redundant activity fields that should be removed are described in subsequent section of this document). The System Change and Data Conversion Required summarize the change needed to support the activity form fields.

Site Id. Form Field	Existing RCRAInfo Hactivity Field	System change required	Data converion requied
10:A:1:A-C:Generator of Haz Waste/Status	fk lu generatorgenerator activ	Use current for Federal Status, and create new foreign keys for State Status.	Use 1, 2, 3, or N for Federal Status. And for State Status, States must define their own.
10:A:1:D:Importer?	None	Add a new field	Default to 'unknown'
10:A:1:E:Mixed Waste Generator?	None	Add a new field	Default to 'unknown'
10:A:2:Transporter?	Transporter Activity	Make field a Yes/No flag.	If 'C' or 'S' or 'X', set to 1 (yes)
10:A:3:Treater, Storer or Disposer?	Tsd Activity	Make field a Yes/No flag.	If 'X', set to 1 (yes)
10:A:4: Recycler?	Recycler Activity	Make field a Yes/No flag.	If 'C' or 'R', set to 1 (yes)
10:A:5:A:Exempt Boiler/ Furnace - SQ Burner	None	Add a new field	Default to 'unknown'
10:A:5:B:Exempt Boiler Furnace - Smelting, melting, refining Furnace	None	Add a new field	Default to 'unknown'
10:A:6:Underground Injection Control	Underground Injection Activity	Make field a Yes/No flag.	If 'X', set to 1 (yes)
10:B:1:A-G:LQH which waste generated and/or accumulated	Universal Activity	Add a new table for 'UWactivity' related to the Hactivity table. Include three fields: UW Type, Generated Indicator, Accumulated Indicator.	Not possible, But very little data anyway.
10:B:2:Destination Facility for UW		Add a new field	Default to 'unknown'
10:C:1:Used Oil Transporter	Used Oil Transporter	Make field a Yes/No flag.	If 'T' or 'B', set to 1 (yes)
10:C:1:Used Oil Transfer Facility	Used Oil Transporter	Add a new field	If 'F' or 'B', set to 1 (yes)
10:C:2:Used Oil Processor	Used Oil Processor Refiner	Make field a Yes/No flag.	If 'P' or 'B', set to 1 (yes)
10:C:2:Used Oil Refiner	Used Oil Processor Refiner	Add a new field.	If 'R' or 'B', set to 1 (yes)
10:C:3:Off-spec Used Oil Burner	Used Oil Burner	Make field a Yes/No flag.	If 'X', set to 1 (yes)
10:C:4:A-B:Marketer who Directs shipments	Used Oil Market Burner	Make field a Yes/No flag.	If 'X', set to 1 (yes)
10:C:4:A-B:Marketer who Claims oil	Used Oil Spec Marketer	Make field a Yes/No flag.	If 'X', set to 1 (yes)

PAA Recommendation: 6 - Collect both State and Federal generator status from States

Recommendation Summary

States will report their State Generator Status as identified by their own regulatory definitions and will also report the generator universe as identified by the Federal regulatory definition based on the best of their ability to determine it.

Design Decisions

Every RCRA Site will have two generator statuses in the system, the Federally defined and the State defined status.

- The State Generator Status is user defined and may contain values specific to that state. An example of the values may be MQG for Medium Quantity Generator. The best Federal equivalent (i.e., LQG, SQG or CESQG) will be referred to in the look up description of the State defined value.
- The Federal Generator Status should be determined by the State either using information collected directly from the regulated community or by extrapolation from waste generation information provided on the Biennial Reporting forms or equivalents when it becomes available. At a minimum, the required reporting frequency for the status is biennial.

REVISED GM / WR FORMS

PAA Recommendation: 15 - Clarify Types of Hazardous Wastes to be reported

Recommendation Summary

The Biennial Reporting form requirements should be changed such that generators only report those hazardous wastes used in the determination of their generator status. Further, the Biennial Reporting form instructions should be changed to clearly identify the wastes that are to be used in making the status determination and associated recommended hazardous waste reporting.

Design Decisions

No changes will be made to existing data held in RCRAInfo

PAA Recommendation: 16 - Streamline Source, Origin Form, and Management Codes

Recommendation Summary

The following three recommendations will be implemented to streamline and improve the usefulness of reported waste information:

The current source codes will be consolidated, regrouped and merged with the origin codes to provide a simpler coding structure. It is intended that this approach will provide more meaningful and consistent responses, reduce at least some of the reporting burden, and support the high-level information categorization needs of the PAA participants. This scheme would reduce the number of choices from 60 to 30 and the groups from 7 to 5. The PAA participants feel that this proposal will result in increased data accuracy and quality through reduced variation in response.

Form codes will be revised resulting in a reduction from 89 to 32 codes. . The improvement reduces the number of form codes from 89 to 32 with 6 high level groups. This improvement will result in increased data accuracy and quality through reduced variation in response with a notable decrease in burden for both the handlers as well as program implementers.

The existing management method coding structure will be revised to eliminate overlap with form codes. This coding structure is based in part on analysis of the frequency and perceived accuracy with which different management method codes were reported in the 1995 BRS data. The impact of the LDR treatment codes was also considered in establishing this list. This reduces the detailed list from 65 entries to 28 and the high-level groups from 14 to 4. This proposal will result in increased data accuracy and quality through reduced variation in response with a notable decrease in burden for both the handlers as well as program implementers.

Design Decisions

The origin code will be removed (archived) from the database and translator file formats.

The current source codes will be consolidated, regrouped and merged with the origin codes to provide a simpler coding structure. The new codes will be added to the existing source codes so

that past data that referred to the old codes can still be accessed. Only the new codes will be allowed for all future data submissions.

Form and management codes will be revised in a similar manner.

PAA Recommendation: 17 - Removal of Data Elements from Biennial Reporting forms

Recommendation Summary

A number of fields currently collected on the Biennial Reporting are no longer required and will be removed form the reporting forms and national systems.

Design Decisions

The RCRAInfo system fields corresponding to those to be removed from the reporting forms will be "archived". This requires that the field be removed from the data entry, removed from the translation files and load routines, and that the database field be relocated in an equivalent 'archive' version of its parent table.

Since the "point of measurement" data element appears to meet no current information need, it will be removed from the current GM data collection forms and from the associated national information systems. Removal of this element will reduce burden for both the generators and the implementers who have to explain its use.

Remove the SIC code form element from the Biennial Reporting GM form. Supplying SIC data on the GM form is currently optional. However, the collection of the NAICS data through the Notification form will be mandatory and will improve the quality and confidence in the data.

Remove the off-site availability form element from the Biennial Reporting forms and from associated data systems, since this information is derivable from TSDF submitted data.

In summary, the following fields will be archived:

Current RCRAInfo Table	***Field***
Bg1 form gm basic information	Wst Origin
Bg1 form gm basic information	Pt Measure
Bg1 form gm basic information	Sic Code
Bg5 form gm offsite shipments	Offsite Avail

PAA Recommendation: 25 - Make source of waste a national data element

Recommendation Summary

The source of hazardous waste will be made a national data element. This data element will be collected from the generator and may be reported at the individual process level, at the manifest shipment level or at the cumulative waste code level (within the reporting cycle). The implementing agency will provide the source code to the national information system at the greatest level of detail feasible within the parameters of their individual authorized programs.

Design Decisions

Make source code mandatory on all translator submissions.

PAA Recommendation: 14 - Tracking Imports of Hazardous Wastes

Recommendation Summary

A reporting mechanism will be added to the Notification form to capture the activity of importing hazardous waste. Adding this information on the Notification form would not exclude the reporting of additional site activities (e.g., hazardous waste transporter).

The Team further proposes that the TSDF continue to report the EPA identification number of the importer as the "generator" of the waste, but also report the country of origin if other than the United States as indicated on the manifest.

Collecting the country of origin will permit implementers to derive that the waste reported by the TSDF was imported into the country. For example: X quantity of waste was received at TSDF Y from agent Z. The fact that agent Z imported the waste can be derived by the country of origin for the waste and the activity of "Hazardous Waste Importer" on the agent's Notification form. Implementing this suggestion will permit authorized programs to examine waste generation in greater detail, with an understanding of the true origin of the imported wastes.

Design Decisions

An Importer Activity flag will be added to RCRAInfo.

Since collecting the country of origin will permit implementers to derive that the waste reported by the TSDF was imported into the country, the 'Country of Origin' field will be added to the form in the 2003 version. For example: X quantity of waste was received at TSDF Y from agent Z. The fact that agent Z imported the waste can be derived by the country of origin for the waste and the activity of "Hazardous Waste Importer" on the agent's Notification form. Implementing this suggestion will permit authorized programs to examine waste generation in greater detail, with an understanding of the true origin of the imported wastes.

Since a new 'Country of Origin' field will capture country of origin data, sites with foreign location addresses will not be allowed in the system. Any records for sites located out of the US will be removed from the RCRAInfo database (if this was not already performed during the recent conversion).

OTHER RCRAINFO SYSTEM CHANGES

PAA Recommendation: 13 - Tracking Hazardous Waste Exports

Recommendation Summary

Export data from the OECA HWES system will be integrated into the national RCRA program information systems. This option presents an improvement with potentially no burden increase to the regulated communities or implementing agencies. Additionally it will provide a mechanism for implementers to communicate with their foreign counterpart, to facilitate tracking of wastes from cradle to grave.

Design Decisions

Import HWES data (based on the annual export report) into national RCRAInfo systems every biennium. An additional field to record the Destination Country will need to be added to RCRAInfo.

There are several key problems that relate to HWES:

- The system does not track the Source Code, a national need
- The system does not track the density of volumetric waste reported, thus making summations of weight inaccurate.
- The system allows for many Waste Codes, but the input for that data when very many are reported has been limited to the term 'Many'

(Note: The management method is 'national' but will be an optional data element for export data, because it is not necessary to know how other countries manage waste that is exported to them.)

These problems should be resolved by OECA, possibly via the next ICR round for the Export Report.

PAA Recommendation: 21 - Determine location coordinates for a RCRA Site

Recommendation Summary

The RCRA Site will be defined locationally by a specific location address. If this is not available the site may be defined by a description, or by geographic coordinates. Additionally, the specific point used to locate the RCRA Site will be specified, for example, the map point of the address or the site centroid.

Locational data will be tracked for all RCRA Sites. RCRAInfo will include automatic address-matching functionality to facilitate data entry by EPA and States. Implementers would be free to use other methods, e.g., GPS to obtain locational data. Provide implementers the option to record locational data at the unit level. Add data fields in keeping with EPA's locational data standard for method, accuracy, description (MAD) meta-data. Eliminate latitude and longitude data collection from the Part A Permit Application.

Design Decisions

The team discussed whether to keep the existing latitude and longitude data in the system. It was determined to give the implementer the choice between three different options. The first option for the implementers is to keep the existing data (in which case the 'source' must be specified). The second option is to use address-matching software (use default for blank lat/long). The third option would be to populate it from EPA's other sources.

Data that is blank will be converted to 'Unknown'. This will be the default from now on. Consequently, the data will not be changed from 'Unknown' until the implementers provide it. This will hopefully erase some confusion for new/old sites without data.

Hlatitude longitude SOURCE field value	***# in system***	***Description***	***Proposed Mapping to Horizontal Collection Method***
A	64668	Submitted by the handler	UNKN (*Unknown*).
I	12443	Latitude/longitude interpolation	IOTH (*Interpolation-Other*)
V	5950	Verified	UNKN (*Unknown*).
Z	27939	Zip Code Centroid	ZIPC (*ZIP Code-Centroid*).
<blank>	4019		UNKN (*Unknown*).

PAA Recommendation: 26 - Record Source of RCRA Site Activity Information

Recommendation Summary

Track the source of each new piece of information regarding the RCRA regulated activities of a Site.

Design Decisions

The existing division of EPA Inspection and State Inspection as different sources of Handler Activity data will be consolidated into one source termed 'Implementer determined'. The existing values for Part A, Notification, and Biennial Report will remain the same.

Shared Information Needs not in RCRAInfo

Design Decisions

The following data elements, defined as shared during the PAA, should be recorded in RCRAInfo:

Dun & Bradstreet Number

Hazardous Waste Transfer Station

Number of Employees

Site Contact Address information.

The field 'Number of Employees' should be a number field and it should be a specific number rather than a range and should represent number of employees at the Site, not across the nation for the company.

Candidate RCRAInfo Fields to be deleted

Design Decisions

The following table lists the current system fields that do not map to any national or shared information needs that were identified during the PAA, and provides definitions for those fields where available. These fields will be "archived" as discussed previously.

RCRAInfo Table	*Field*	*Definition (where available)*
Hcontact	Contact title	*Title of the person who is familiar with the handler's operation and the information provided to the authorizing agency.*
Hhandler	Acknowledge Flag	*A flag used to request that an acknowledgment be sent.*
Hhandler	Acknowledge Date	*Date an acknowledgment was generated.*
Hhandler	River Basin	*U.S. Geological Survey (USGS) code identifying the river basin in which the facility is located.*
Hhandler	State District	*Code indicating the state-designated legislative district(s) in which the site is located.*
Howner operator	Street1	*First line of the street address or post office box number of the facility owner or operator.*
Howner operator	Street2	*Second line of the the street address or post office box number of the facility owner or operator*
Howner operator	City	*The city or town in the address of the facility owner or operator.*
Howner operator	State	*The two-letter postal code for the state in the address of the facility owner or operator.*
Howner operator	Zip	*Zip code in the address of the owner or operator.*
Howner operator	Phone	*Telephone number associated with the owner or operator specified..*
Hsic	Primary Sic Indicator	*Indicates the location of the agency regulating the handler.*
Hsic	Sic Source	*Code indicating whether the SIC Code was reported by the facility or determined at a later date by the authorizing agency.*
Hactivty	Air	*Flag indicating that the handler transports hazardous waste via air.*
Hactivty	Rail	*Flag indicating that the handler transports hazardous waste via rail.*
Hactivty	Highway	*Flag indicating that the handler transports hazardous waste via road..*
Hactivty	Water	*Flag indicating that the handler transports hazardous waste via water.*
Hactivty	Other Mode	*Flag indicating that the handler transports hazardous waste via some method other than air, rail, road, or water.*

RCRAInfo Table	*Field*	*Definition (where available)*
Hactivity	Generator RCRA Desc	*Description which expands on the RCRA Generator Regulatory Status.*
Hactivity	Generator RCRA Status	*Code indicating whether a generator is regulated under a state authority which is more stringent or broader in scope than the federal RCRA program.*
Hactivity	Generator State Desc	*Description which expands on the State Generator Regulatory Status.*
Hactivity	Generator State Status	*Code indicating whether a generator is regulated under a state authority which is more stringent or broader in scope than the federal RCRA program.*
Hactivity	Transporter State Status	*Code indicating whether a transporter is regulated under a state authority which is more stringent or broader in scope than the federal RCRA program.*
Hactivity	Transporter RCRA Desc	*Code detailing the reason that a transporter is not subject to the controls under the federal RCRA program or is subject to such controls on a periodic basis. A separate data element (TRANSPORTER_STATE_DESC) is available for reasons the handler is exempt, excluded, or either conditionally or not subject to State regulations.*
Hactivity	Transporter State Desc	*Description which expands on the State Transporter Regulatory Status.*
Hactivity	Tsd RCRA Status	*Code indicating whether a facility is regulated under the authority of the federal RCRA program.*
Hactivity	Tsd State Status	*Code indicating whether a facility is regulated under a state authority which is more stringent or broader in scope than the federal RCRA program.*
Hactivity	Tsd State Desc	*Description which expands on the State TSD Regulatory Status.*
Hactivity	Tsd RCRA Desc	*Description which expands on the State TSD Regulatory Status.*
Hactivity	Used Oil Recycler Activity	*Code indicating that the handler is engaged in used oil recycling activities.*
Hactivity	Used Oil State Status	*Code indicating whether the used oil recycler is regulated under a State authority which is more stringent or broader in scope than the Federal RCRA program.*
Hactivity	Used Oil State Desc	*Description which expands on the State Used Oil Recycler Regulatory Status.*
Hactivity	Used Oil Utility Boiler	*Code indicating that the handler is a burner using a utility boiler.*
Hactivity	Used Oil Industrial Boiler	*Code indicating that the handler is a burner using an industrial boiler.*
Hactivity	Used Oil Industrial Furnace	*Code indicating that the handler is a burner using an industrial furnace.*

RCRAInfo Table	*Field*	*Definition (where available)*
Hactivity	Used Oil Collection Site	*Code indicating that the handler is a Used Oil Collection Center or Aggregation Point.*
Hactivity	Hwfuel Activity	*No definition available.*
Hactivity	Hwfuel RCRA Status	*No definition available.*
Hactivity	Hwfuel State Status	*No definition available.*
Hactivity	Hwfuel State Desc	*No definition available.*
Hactivity	Hwfuel Market Burner	*Code indicating that the handler is a generator engaged in marketing to burners of hazardous waste fuel activities.*
Hactivity	Hwfuel Other Marketer	*No definition available.*
Hactivity	Hwfuel Marketer	*No definition available.*
Hactivity	Hwfuel Utility Boiler	*No definition available.*
Hactivity	Hwfuel Burner	*No definition available.*
Hactivity	Hwfuel Industrial Boiler	*No definition available.*
Hactivity	Universal Waste Activity	*Code indicating that the handler is engaged in the storing, transporting, or collecting of universal wastes regulated under the Resource Conservation and Recovery Act (RCRA).*
Hactivity	Universal State Status	*Code indicating that the handler is engaged in the storing, transporting, or collecting of universal wastes regulated under a State authority which is more stringent or broader in scope than the Federal RCRA program.*
Hactivity	Universal State Desc	*Code detailing the reason that a universal waste handler is not subject to the controls under the federal RCRA program or is subject to such controls on a periodic basis.*
Hactivity	Universal RCRA Status	*Code indicating whether a universal waste handler is regulated under the authority of the federal RCRA program.*
Hactivity	Universal RCRA Desc	*Code detailing the reason that a universal waste handler is not subject to the controls under the federal RCRA program or is subject to such controls on a periodic basis.*
Bs123 form ic part 1	Source Reduction10	*1 Character fields with no definitions - y or n*
Bs123 form ic part 1	Recycling Limit1	*1 Character fields with no definitions - y or n*
Bs123 form ic part 1	Recycling Limit2	*1 Character fields with no definitions - y or n*
Bs123 form ic part 1	Recycling Limit3	*1 Character fields with no definitions - y or n*
Bs123 form ic part 1	Recycling Limit4	*1 Character fields with no definitions - y or n*
Bs123 form ic part 1	Recycling Limit5	*1 Character fields with no definitions - y or n*
Bs123 form ic part 1	Recycling Limit6	*1 Character fields with no definitions - y or n*
Bs123 form ic part 1	Recycling Limit7	*1 Character fields with no definitions - y or n*
Bs123 form ic part 1	Recycling Limit8	*1 Character fields with no definitions - y or n*
Bs123 form ic part 1	Recycling Limit9	*1 Character fields with no definitions - y or n*

RCRAInfo Table	*Field*	*Definition (where available)*
Bs123 form ic part 1	Recycling Limit10	*1 Character fields with no definitions - y or n*
Bs123 form ic part 1	Recycling Limit11	*1 Character fields with no definitions - y or n*
Bs123 form ic part 1	Recycling Limit12	*1 Character fields with no definitions - y or n*
Bs123 form ic part 1	Recycling Limit13	*1 Character fields with no definitions - y or n*
Bs123 form ic part 1	Recycling Limit14	*1 Character fields with no definitions - y or n*
Bs123 form ic part 1	Recycling Limit15	*1 Character fields with no definitions - y or n*

NOTE: EPA will need to reconcile the statute, the rule, and the need to remove the requirement in BR to report source reduction data.

EPA's National Report Generation

Waste generation and management information reported on the biennial Hazardous Waste Report forms is used to produce a *National Report* that summarizes generation, management, shipment and receipt volumes for the nation. It is necessary to distinguish waste that is counted for the national report, and waste that is not counted for the report.

The team has recommended a flag be added at the 'waste stream' level, and the facility level. This will separate the waste to be used in the National Review from state only waste. The default will be to include the site/waste in the national report. This will also put the responsibility on the implementer and not EPA to determine what should be excluded. This flags will be referenced as 'Include in National Waste Reports'.